



U.S. Department of Justice

United States Attorney  
Southern District of New York

## MEMO ENDORSED

United States District Courthouse  
300 Quarropas Street  
White Plains, New York 10601

March 5, 2021

BY ECF

The Honorable Kenneth M. Karas  
United States District Court  
Southern District of New York  
300 Quarropas Street  
White Plains, New York 10601

**Re: *United States v. Karen Polonia Alcantara, et al.*, 19 Cr. 195 (KMK)**

Dear Judge Karas:

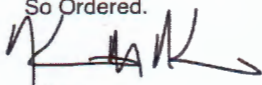
The Government respectfully submits this letter, with the consent of counsel to each defendant, to request an approximately 60-day adjournment of the upcoming status conference, previously scheduled for March 9, 2021. The parties are seeking the adjournment due to the restrictions on travel and contact in light of the COVID-19 pandemic.

The parties have been discussing potential dispositions of the case without trial. Additionally, in the coming weeks, counsel anticipate that defendant Maximiliano Torres-Torres will be prepared to enter a guilty plea pursuant to a plea agreement. The adjournment will provide the parties with time to finalize plea discussions. Additionally, the Government has made electronically stored information and other discovery available to the defense. To allow the defense time to review the discovery and determine what motions, if any, they wish to make, and in light of the COVID-19 pandemic and related restrictions on travel and contact, the Government requests that the time between the date of this letter and the next scheduled conference date be prospectively excluded under the Speedy Trial Act, 18 U.S.C. § 3161(h)(7)(A), in the interest of justice.

Granted.

The conference is adjourned to 5/11/21 at noon. Time is excluded until then, in the interest of justice, to allow the Parties adequate time to continue their discussions toward a disposition and because of the coronavirus pandemic. The interests of justice from this exclusion outweigh Defendants' and the public's interest in a speedy trial. See 18 U.S.C. Section 3161(h)(7)(A).

So Ordered.

  
3/8/21

Respectfully submitted,

AUDREY STRAUSS  
United States Attorney

By:                     /s                      
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